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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

LESLIE JENSON, Plaintiff, vs. JP MORGAN CHASE & CO.; and DOES 1 through 10, inclusive, Defendants.	Case No.: 08cv-334-JLF(WMc) OBJECTIONS TO DEFENDANT'S EX-PARTE REQUEST FOR PERMISSION TO APPEAR BY TELEPHONE AT THE ENE CONFERENCE

Plaintiff Leslie Jenson ("Jenson"), by and through her undersigned attorneys, submits her Objections To Defendant's Ex-Parte Request For Permission To Appear By Telephone At The ENE Conference as follows:

STATEMENT OF THE CASE

Jenson has a credit card account with Defendant Chase known as Account Number 5222763211525450 (the "Account").

In or about November, 2007, Jenson discovered that Chase was reporting the Account as a "charge-off".

Chase has reported to the credit reporting agencies that the Account was charged-off in December, 2006.

Jenson was not delinquent in her payments regarding the Account to support a charge-off. For example, and without limitation, Jenson has timely paid, and Chase has accepted, at least the minimum monthly payment for the Account since at least December, 2005 to present.

Chase never gave Jenson notice that the Account was delinquent from December, 2006 to present.

Chase never gave Jenson notice that it intended to report negative information regarding the Account and Jenson to the credit reporting agencies.

Jenson has disputed Chase's credit reporting with Chase and the credit reporting agencies. Chase responded by verifying the negative credit reporting to the credit reporting agencies.

A charge-off is reported by the credit reporting agencies as a delinquent account that contains negative account status. Jenson's credit score has been negatively impacted by Chase's inaccurate credit reporting. The negative impact by Chase on Jenson's credit score has interfered with Jenson's ability to access credit.

ARGUMENT

On March 12, 2008, Jenson's counsel received by mail an ex-parte letter dated March 10, 2008 sent by counsel for Chase to the Court requesting Chase be allowed to appear by telephone at the ENE Conference (the "Request"). The Request should be denied for at least each of the following reasons:

1) Chase removed this action from the San Diego Superior Court to this Court. Jenson had no desire to burden the Court's busy docket with this action. One of the consequences of removal is the ENE Conference set forth in Local Rule 16.1(c) which requires personal attendance. The ENE Conference is very often not productive for settlement unless there is personal attendance of the parties;

2) Chase has given no extraordinary circumstances to be excused from personal attendance as required by the Court's Notice And Order For Early Notice And Order For Early Neutral Evaluation Conference;

3) Chase never met and conferred with counsel for Plaintiff prior to submitting the Request and failed to comply with Local Rule 83.3(h); and

4) The Request was not filed electronically in violation of Local Rule 5.4. This prejudiced Plaintiff's ability to immediately respond to the Request as the Request was mailed from San Francisco.

Dated: March 12, 2008

LAW OFFICES OF DOUGLAS JAFFE

s/_ Douglas Jaffe___________________

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CERTIFICATE OF SERVICE

I am over the age of 18 years and not a party to or interested in the within entitled action. My business address is 402 West Broadway, 4th Floor, San Diego, California 92101.

On March 12, 2008, I electronically filed the foregoing

OBJECTIONS TO DEFENDANT'S EX-PARTE REQUEST FOR PERMISSION TO APPEAR BY TELEPHONE AT THE ENE CONFERENCE

with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

Pamela Zanger, Esq.
Ropert, Majeski, Kohn & Bentley
201 Spear Street, Suite 1000
San Francisco, California 94105
pzanger@rmkb.com

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 12, 2008 at San Diego, California.

LAW OFFICES OF DOUGLAS JAFFE

s/_ Douglas Jaffe___________________
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